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UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA

MORENA MORROW, an individual,

 Plaintiff,

v.

WAL-MART, INC., a Foreign Corporation;
 M&D Group, LLC, a Nevada Limited Liability
 Company; DOE MANAGER; DOE & ROE
 EMPLOYEES; DOE & ROE EMPLOYERS;
 DOE OWNERS I-V; ROE OWNERS I-V;
 ROE EMPLOYERS I-V; DOES I-V;
 and ROE COMPANIES I-V, inclusive,

 Defendants.

Case No. 2:23-CV-01125-CDS-EJY

**STIPULATION AND ORDER TO EXTEND
 DISCOVERY PLAN AND SCHEDULING
 ORDER**

(SECOND REQUEST)

COMES NOW Plaintiff, MORENA MORROW, by and through her attorney of record,
 ERIC R. BLANK, ESQ. and HARRY V. PEETRIS, ESQ. of ERIC BLANK INJURY
 ATTORNEYS, and Defendant, WAL-MART, INC. (“Defendant” or “Walmart”) by and through
 its attorneys of record, KURT R. BONDS, ESQ., MADISON M. AGUIRRE, ESQ., and TANYA
 M. FRASER, ESQ., of HALL & EVANS, LLC, and hereby submit this Stipulation and Order to
 Extend Discovery Plan and Scheduling Order (First Request) pursuant to LR IA 6-1 and LR 26-3
 as follows:

...

I.**PROCEDURAL HISTORY**

On June 8, 2023, Plaintiff filed her Complaint against Defendant WAL-MART, INC. with the Eighth Judicial District Court for Clark County, Nevada. On June 28, 2023, Walmart filed its Answer to Plaintiff's Complaint. On July 13, 2023, Plaintiff filed her Request for Exemption from Arbitration in which she outlined her claimed injuries and alleged damages. On July 18, 2023, Defendant filed its Petition for Removal and removed the matter to this Court based on diversity jurisdiction. On July 20, 2023, Defendant filed its Statement Regarding Removal. The parties participated in the Fed. R. Civ. P. 26(f) conference on August 11, 2023, and their proposed Joint Discovery Plan and Scheduling Order was entered by this Court on July 12, 2023.

II.**DISCOVERY COMPLETED****To date, Plaintiff has completed the following discovery:**

- Plaintiff's FRCP 26 Initial Disclosure, served September 27, 2023;
- Plaintiff's First Set of Interrogatories to Defendant, served August 15, 2023;
- Plaintiff's First Set of Requests for Production to Defendant, served August 15, 2023;
- Plaintiff's First Set of Requests for Admissions to Defendant, served August 15, 2023;

To date, Defendant has completed the following discovery:

- Defendant's FRCP 26 Initial Disclosure, served November 17, 2023;
- Defendant's Answers to Plaintiff's First Set of Interrogatories to Defendant, served November 14, 2023;
- Defendant's Responses to Plaintiff's First Set of Requests for Production to Defendant, served November 14, 2023;
- Defendant's Responses to Plaintiff's First Set of Requests for Admissions to Defendant, served November 14, 2023;
- Defendant's First Set of Interrogatories to Plaintiff, served on November 17, 2023;
- Defendant's First Set of Requests for Production of Documents to Plaintiff, served on November 17, 2023; and

- Defendant's First Set of Requests for Admissions to Plaintiff, served on October 19, 2023.

III.

DISCOVERY REMAINING TO BE COMPLETED

- Deposition of Plaintiff;
- Deposition of Defendant's employee(s);
- Deposition of Defendant's corporate representative(s);
- Depositions of Plaintiff's treating providers;
- Depositions of percipient witnesses;
- Initial expert designations;
- Rebuttal expert designations;
- Depositions of Initial and Rebuttal Experts;
- Additional written discovery.

Good cause exists to continue the current Discovery Plan and Scheduling Order. The parties have diligently worked to move the case forward and are coordinating private mediation in an attempt to resolve this matter prior to disclosure of expert opinions, the deadline for which is currently December 18, 2023. The parties have also been working to negotiate parameters for a site inspection and to schedule the depositions of the parties, but have experienced delays arising from scheduling conflicts. The parties have tentatively agreed to schedule mediation to occur in January 2024 and the site inspection to occur shortly thereafter, in the event resolution is not obtained, and are awaiting final availability of their experts. The depositions of the parties are also expected to be completed in mid to late January 2024, if needed. As such, the parties agree that an additional 90 days is needed to gather relevant evidence prior to disclosing expert opinions. No trial date has been set in this matter and neither party will be prejudiced by the requested extension.

IV.

PROPOSED DISCOVERY SCHEDULE AND TRIAL DATE

	Current Date	Proposed Date
Discovery Cut-Off:	02/14/2024	05/14/2024

Motions to Amend Pleadings / Add Parties:	CLOSED	CLOSED
Initial Expert Disclosures:	12/18/2023	03/18/2024
Rebuttal Expert Disclosures:	01/17/2024	04/16/2024
Dispositive Motions:	03/16/2024	06/14/2024
Joint Pre-Trial Order:	04/14/2024	07/15/2024

This is the second request for an extension of time in this matter and no trial date will be impacted by the extension as no such trial date has been set. The parties submit that the reasons set forth above constitute good cause for the requested extension.

DATED this 30th day of November, 2023.

DATED this 30th day of November, 2023.

ERIC BLANK INJURY ATTORNEYS

HALL & EVANS, LLC

/s/Harry V. Peetris

/s/Kurt R. Bonds

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ORDER

IT IS SO ORDERED:

December 1, 2023

DATE


UNITED STATES MAGISTRATE JUDGE

SUBMITTED this 30th day of November, 2023.

HALL & EVANS, LLC

/s/Kurt R. Bonds

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